

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

STAMBAUGH’S AIR SERVICE, INC.,	:	
	:	Civil Action No. 1:00-CV-660
Plaintiff	:	
	:	(Magistrate Judge Smyser)
v.	:	
	:	
SUSQUEHANNA AREA REGIONAL	:	
AIRPORT AUTHORITY, et al.,	:	
	:	
Defendant	:	

MOTION FOR ENLARGEMENT OF TIME

AND NOW, this 20th day of March, 2006, comes Plaintiff, Stambaugh’s Air Service, Inc., by and through its counsel, Cunningham & Chernicoff, P.C., and hereby moves this Honorable Court for an enlargement of time and in support thereof avers as follows:

1. The Honorable Judge Yvette Kane, United States District Judge, entered a Memorandum and Order in this case on March 16, 2006 (the “Order”).

2. Among other things, the Order remanded this case to Magistrate Judge Smyser for further proceedings.

3. The Order allows Plaintiff to file an Amended Complaint as to Count V within ten (10) days from the date of the Order.

4. Attorney Jordan D. Cunningham, is the attorney of record on behalf of the Plaintiff in this matter.

5. Attorney Cunningham is traveling abroad from March 17th through April 4, 2006, and, therefore, will be unable to submit an Amended Complaint as to Count V by the date set forth by Judge Kane.

6. Plaintiff respectfully requests that this Honorable Court issue an Order enlarging the time in which Plaintiff may file an Amended Complaint as to Count V.

7. Counsel for the Defendant was contacted via telephone on March 20, 2006, regarding his concurrence with this Motion, and Defendant's counsel indicated that he does concur in Plaintiff's Motion.

WHEREFORE, Plaintiff, Stambaugh's Air Service, Inc., hereby respectfully requests that this Honorable Court grant Plaintiff's Motion and issue an Order, substantially in the form of Plaintiff's proposed Order, enlarging the time in which Plaintiff may file an Amended Complaint as to Count V. Plaintiff further requests this Honorable Court grant it such further relief as is just and proper.

Respectfully submitted,

CUNNINGHAM & CHERNICOFF, P.C.

By: /s/ Kelly M. Knight
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Date: March 20, 2006

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